



**Indiana State Conference of the NAACP
Comments IURC Securitization**

THE MISSION OF THE NAACP IS TO ACHIEVE EQUITY, POLITICAL AND EDUCATIONAL RIGHTS AND SOCIAL INCLUSION BY ADVANCING POLICIES AND PRACTICES THAT PROMOTE THE EXPANSION OF HUMAN AND CIVIL RIGHTS, THE ELIMINATION OF DISCRIMINATION, AND THE WELL BEING OF BLACK PEOPLE AND ALL PERSON'S OF COLOR.

Our Environmental and Climate Justice Program works on three objectives:

- Reducing harmful pollution, particularly greenhouse gases
- Advancing clean energy and energy efficiency
- Supporting our communities resiliency and livability

We offer these recommendations for rulemaking on the securitization pilot

Identification and description regarding the use of the securitization bonds proceeds and accounting entries at receipt of bond proceeds.

The feasibility of sharing savings realized by electric utilities through securitization of qualified costs with:

(A) workers displaced by the retirement of electric generation facilities; and
(B) Indiana communities that suffer job loss and loss of tax base as a result of the retirement of electric generation facilities, including:

(i) economically distressed communities;

(ii) minority communities; and

(iii) communities in areas that have been

environmentally and economically affected by electric generation facilities.

The feasibility of using savings realized by electric utilities through securitization of qualified costs to facilitate an economically equitable transition to renewable energy, including through:

(A) job training for workers displaced by the retirement of electric generation facilities;

(B) vocational training for employment in career fields related to renewable energy for underrepresented

(C) contract opportunities for minority and women's business enterprises; and

(D) community economic development, including in the forms of equitable investment districts (or "green zones")."

Identification and description of the proposed mechanism to reduce the electric utility's base rates and charges upon assessment of the securitization charges on customer bills, so as to remove any qualified costs from the electric utility's base rates and provide timely savings to customers.

Carve-out Community-Owned Solar

Shared solar is the most common form of community-owned renewable energy, but community-owned renewable energy can take several forms including wind, and geothermal,

Environmental Benefits are :

lifts the environmental burdens placed on communities by the traditional fossil fuel based industry

Helps reduce greenhouse gas emissions and related climate change impacts

Increases energy efficiency and minimizes loss of electricity through long-distance transmission

Increases community awareness of energy use and its localized impacts

Greater conservation and sustainability behavior

Reduces impacts of extractive energy industry, by decreasing or eliminating fossil fuel energy use

Economic Benefits

Price certainty and stability, since renewable energy like wind and solar are zero-cost fuels

Economies of scale;

community-scale renewables are less costly per Watt of capacity than individual arrays

Helps keep money invested in the local economy-Job creation in the host community

Adds new technical skills to the community skill base

Reduces local economic dependence on dirty energy sources

Social Benefits

Gives community members the opportunity to take control of the planning, development, and maintenance of energy

Ensures that energy systems are designed to maximize public and community benefit Improves community resiliency and gives the community control over their own energy production and distribution

Increases energy accessibility

Advances community self-determination and allows community members to advocate on their own behalf

Increased democracy by shifting revenue from fossil fuel companies that have used profits to suppress civil rights, into the hands and control of communities.

Barbara Bolling Williams

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Denise Abdul-Rahman

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